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United States of America

6 IN THE UNITED STATES DISTRICT COURT

7 EASTERN DISTRICT OF CALIFORNIA

8

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 HORACIO TORRECILLAS URIAS JR.,

13 Defendant.

CASE NO. 1:22-CR-00062-JLT-SKO

STIPULATION TO VACATE TRIAL AS TO
HORACIO TORRECILLAS URIAS JR. AND SET
CASE FOR CHANGE OF PLEA AND ORDER
THEREON

Court: Hon. Jennifer L. Thurston

14

15 STIPULATION

16 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
17 through defendant's counsel of record, hereby stipulate as follows:

18 1. By previous order, this matter was set for a TRIAL on SEPTEMBER 24, 2024.

19 2. By this stipulation, defendant now moves to vacate the TRIAL as to HORACIO

20 TORRECILLAS URIAS JR. and to set the case for a change of plea hearing on AUGUST 26, 2024

21 at 9:00 a.m. before the Hon. Jennifer L. Thurston. The proposed change of plea date represents the
22 earliest date that all counsel are available, taking into account counsels' schedules, defense counsels'
23 commitments to other clients, and the court's available dates for a change of plea hearing.

24 3. The parties agree and stipulate, and request that the Court find the following:

25 a) The discovery associated with this case is voluminous and includes tens of
26 thousands of pages, including investigative reports, photographs and videos, as well as hundreds
27 of hours of recorded telephone conversations pursuant to wiretap orders, many cellular phone
28 extractions, and large amounts of cellular telephone precise location data and vehicle tracker

1 data. All this discovery has been either produced directly to counsel and/or made available for
2 inspection and copying.

3 b) Defense counsel has received a plea agreement from the government and needs
4 the additional time to finalize the agreement and meet with her client to prepare for the change of
5 plea hearing.

6 c) Counsel for the defendant believes that failure to grant the above-requested
7 continuance would deny her the reasonable time necessary for effective preparation, taking into
8 account the exercise of due diligence.

9 d) The government does not object to the continuance.

10 e) Based on the above-stated findings, the ends of justice served by continuing the
11 case as requested outweigh the interest of the public and the defendant in a trial within the
12 original date prescribed by the Speedy Trial Act.

13 4. Speedy trial time has previously been excluded beyond the proposed change of plea
14 hearing date.

15 5. Nothing in this stipulation and order shall preclude a finding that other provisions of the
16 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
17 must commence.

18 IT IS SO STIPULATED.

19 Dated: July 16, 2024

PHILLIP A. TALBERT
United States Attorney

21 By: /s/ JUSTIN J. GILIO

22 JUSTIN J. GILIO
Assistant United States Attorney

24 Dated: July 16, 2024

/s/ Galatea DeLapp
25 Attorney for Defendant
Horacio Torrecillas Urias Jr.

1 **O R D E R**

2 IT IS SO ORDERED.

3 Dated: July 17, 2024


4 UNITED STATES DISTRICT JUDGE

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